



**Rocky Flats Citizens Advisory Board  
Recommendation 2005-1**

**Recommendation on the Original Landfill  
Interim Measure/Interim Remedial Action**

**Approved January 6, 2005**

Letter to:

Mr. Frazer Lockhart  
Manager, DOE-RFPO  
10808 Highway 93, Unit A  
Golden, CO 80403

Dear Frazer:

The Rocky Flats Citizens Advisory Board appreciates the opportunity to review and provide comments and recommendations on the draft Interim Measure/Interim Remedial Action (IM/IRA) for the Original Landfill.

While the Board recognizes the tremendous amount of work, research, and preparation that has gone into the document and the remediation plans, the Board has several concerns. We do agree that the first alternative, the No-Action alternative, is not acceptable in meeting the Remedial Action Objectives and the fourth alternative, complete removal of the waste, is not practicable.

I. The Board agrees with the proposal to grade the landfill and install a two-foot soil cover over the site of the Original Landfill; however, the Board is concerned about stability at the landfill. Maps from the U.S. Geological Survey show the landfill is in an area of geological instability and is prone to landslides. Over time, the cover could slump and slide and, thus, potentially expose the wastes to humans and the environment. Exposing the wastes would contradict the Remedial Action Objectives (RAOs) to prevent direct contact with landfill soil and commingled waste. The Board believes the addition of a toe buttress, as outlined in Alternative No. 3, would help stabilize the landfill cover. In addition, to prevent groundwater from destroying the integrity of the buttress, the Board believes a drainage system must be installed between the buttress and the cover and underneath the buttress to divert groundwater around the buttress. This would also allow access for monitoring the diverted groundwater.

A. The Board, therefore, recommends that a modified Alternative No. 3 be chosen rather than the Proposed Alternative No. 2.

B. Further, the Board recommends that Alternative No. 3 be modified by the addition of a drainage system to maintain the integrity of the buttress. Both the cover and the buttress should be designed using appropriate engineering practices. The drainage system should be L-shaped, and begin at the point located between the cover and the buttress, with the bottom part of the "L" leading under the buttress so as to move groundwater downslope and away from the buttress and the landfill.

II. While the document refers to stewardship activities to monitor both the ground water and surface water, there are no details contained in the IM/IRA on these water monitoring networks. Further, at meetings of both the Ground Water and Surface Water Integrated Monitoring Plan Working Groups, stakeholders were informed that the monitoring networks would be addressed in the Original Landfill IM/IRA.

The document does not indicate monitoring of the landfill will continue past the first five years after remediation of the landfill is complete. The Board

is aware that details of the monitoring program beyond five years will depend on conditions found at that time, however, the document should be changed to recognize that monitoring may continue to be necessary after five years.

- A. The Board recommends that the IM/IRA include a detailed description of the groundwater monitoring network and the surface water monitoring network for the Original Landfill.
- B. The Board further recommends that it be allowed to comment on the proposal for both monitoring networks before the IM/IRA is made final.
- C. The Board also recommends that the document be changed to recognize that monitoring may continue to be necessary after five years and should recognize that a decision to continue monitoring of the Original Landfill should be made at the time of the five-year review and should be based on conditions of the Original Landfill at that time.

III. The Board is concerned with the health and safety of workers who will assist in remediating the Original Landfill because they may potentially be exposed to hazardous constituents during the remediation. However, the IM/IRA is deficient in detailing how workers will be protected during remediation activities. The document should reveal how the Site intends to protect workers while the remediation is taking place.

- A. The Board recommends that the IM/IRA for the Original Landfill contain language that specifies how workers will be protected during the remediation of the Original Landfill.

IV. The Board is concerned that the landfill area be protected from intrusion by humans in order to protect human health, the environment, and monitoring systems. To that end the Board thinks that fencing, signs, and other protocols need to be erected in the landfill area in the same way as proposed for the Present Landfill.

- A. The Board recommends that the same protocol established for fencing and signs for the Present Landfill also be used at the Original Landfill.

V. The Board is concerned with the lack of specificity with respect to the borrow areas, from which cover materials will be obtained, and how the site will restore and revegetate the areas from which fill is taken.

- A. The Board recommends that the Original Landfill IM/IRA identify the borrow areas from which cover materials will be obtained. For those onsite areas from which materials will be taken, the document should be specific in describing the process of restoration and revegetation. The Board recommends the Site consult with the U.S. Fish and Wildlife Service to ensure revegetation and restoration of disturbed areas are in line with the goals of the refuge.

We thank the Department of Energy for the opportunity to comment on this important document. We look forward to your comments on our recommendations and to the continuing dialogue and partnership with the Department of Energy.

Sincerely,

Gerald L. DePoorter  
Chair

cc: Mr. Steve Gunderson, CDPHE  
Mr. Mark Aguilar, EPA  
Mr. Bob Davis, Kaiser-Hill

Mr. Bob Birk, DOE-RFPO

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The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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